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Attorneys for Plaintiff

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 NECHE, LLC, a Nevada Limited
10 Liability Corporation,

11 Plaintiff,

12 vs.

13 ALLIED INSURANCE COMPANY
14 OF AMERICA, an Ohio Corporation;
15 NATIONWIDE MUTUAL
16 INSURANCE COMPANY, an Illinois
17 Corporation,

18 Defendants.

Case No. 2:19-cv-01016-APG-VCF

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR
PLAINTIFF TO FILE FIRST
AMENDED COMPLAINT**

19 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff
20 NECHE, LLC (“Neché” or “Plaintiff”) and Defendant ALLIED INSURANCE
21 COMPANY OF AMERICA (“Allied” or “Defendant”), by and through their
22 respective attorneys of record, that:

- 23 1. The deadline for Plaintiff to file its First Amended Complaint shall be
24 extended through and including March 20, 2020.
- 25 2. The deadline for Defendant to file a Response to Plaintiff’s First Amended
26 Complaint shall be extended through and including April 3, 2020.

Reason for the Extension:

27 The Court previously granted Plaintiff an extension until February 28, 2020 to
28 file its First Amended Complaint and allowing Defendant until March 20, 2020 to
file its Response (Doc. 52). However, Plaintiff’s undersigned counsel, Michael N.
Poli (“Attorney Poli”) left his former firm (Merlin Law Group) on January 31, 2020,

1 and established a new firm, Poli, Moon & Zane. In doing so, it was uncertain
 2 whether Attorney Poli would continue representing Plaintiff at his new firm.
 3 Attorneys Michael Ponzo ("Attorney Ponzo") and Courtney Abrams ("Attorney
 4 Abrams"), both admitted *pro hac vice* were primarily handling this matter, under
 5 Attorney Poli's supervision.

6 On March 12, 2020 Attorneys Ponzo and Abrams filed a Notice of their
 7 withdrawal as *pro hac vice* counsel for Plaintiff (Doc. 56), and Attorney Poli was
 8 able to obtain the complete file from Merlin Law Group. After carefully reviewing
 9 the file, Attorney Poli became aware that the Amended Complaint was never filed on
 10 February 28, 2020, as ordered by the Court (Doc. 52).

11 Therefore, Plaintiff and Defendant respectfully request this Court grant
 12 Plaintiff an extension through and including March 20, 2020 in which to file its First
 13 Amended Complaint, and Defendant an extension through April 3, 2020 in which to
 14 file its Response.

15 DATED this 19th day of March, 2020. DATED this 19th day of March, 2020.

16
 17 By: /s/ Michael N. Poli
 18 MICHAEL N. POLI, ESQ.
 19 Nevada Bar No. 005461
 20 2999 N. 44th Street, Suite 325
 21 Phoenix, Arizona 85018
 22 Attorneys for Plaintiff Neche, LLC

By: /s/ Mayra Salinas-Menjivar
 ROBERT W. FREEMAN, ESQ.
 Nevada Bar No. 3062
 PRISCILLA L. O'BRIANT, ESQ.
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 6385 S. Rainbow Blvd., Suite 600
 Las Vegas, Nevada 89118
 Attorneys for Defendant Allied
 Insurance Company of American

23 ORDER

24
 25 IT IS SO ORDERED:
 26 3-19-2020

27 DATED: _____

28 UNITED STATES MAGISTRATE JUDGE